DOCUMENT RESUME

ED 285 479 HE 020 621

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TITLE Changes in California State Oversight of Private Postsecondary Education Institutions. A Staff Report to the California Postsecondary Education Commission. Commission Report 87-16.
INSTITUTION California State Postsecondary Education Commission, Sacramento.
PUB DATE 16 Mar 87
NOTE 17p.
AVAILABLE FROM California State Postsecondary Education Commission, 1020 12th Street, 3rd Floor, Sacramento, CA 95814-3985.
PUB TYPE Reports - Descriptive (141)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Accreditation (Institutions); Accrediting Agencies; *Educational Quality; *Government School Relationship; Institutional Evaluation; Postsecondary Education; *Private Colleges; Program Evaluation; *State Licensing Boards; *State Standards
IDENTIFIERS *California; Out of State Institutions; Western Association of Schools and Colleges

ABSTRACT

Changes during the last year in legislation, policies, and procedures that affect the operations and quality of California's private colleges are described. Accredited in-state and out-of-state colleges, approved colleges, and authorized colleges are covered. Colleges can substitute periodic peer review through an accrediting agency for review by the state oversight agency. The Western Association of Schools and Colleges (WASC) accredits most California degree-granting institutions. Approval involves state review and assessment of the quality of the college and its programs. Authorization is needed to start new colleges and to operate existing colleges with little or no governmental oversight. Developments during the last year include: some colleges have difficulty complying with new WASC accreditation standards; out-of-state accredited colleges will be reviewed through a new licensure process involving formal and cooperative assessment by a regional accrediting association and the State Department of Education; questions remain about the state approval process and its ability to permit the licensure of only quality institutions; and weaknesses exist within the statute that allows institutions with questionable academic programs to continue to operate. (SW).

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Summary

In 1988, the California Postsecondary Education Commission must evaluate the effectiveness of existing law and the implementation of this law by the State Department of Education in protecting the integrity of degrees and diplomas issued by private postsecondary educational institutions in California. This fall, the Commission will consider a prospectus by its staff for that evaluation.

In preparation for those forthcoming activities, this Commission staff report describes the many changes that have occurred in the past year in legislation, policies, and procedures affecting the operations and quality of California's private postsecondary institutions. Following an introduction, the report is organized in terms of type of State recognition of institutions:

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The report was prepared by Bruce D. Hamlett and William K. Haldeman of the Commission staff and was discussed by the Policy Evaluation Committee of the Commission at its March 16, 1987, meeting. Additional copies of the report may be obtained from the Publications Office of the Commission. Further information about the report may be obtained from Bruce Hamlett at (916) 322-8010 or William Haldeman at (916) 322-7991.

CHANGES IN CALIFORNIA STATE OVERSIGHT OF PRIVATE POSTSECONDARY EDUCATION INSTIUTUTIONS

A Staff Report to the California Postsecondary Education Commission

CALIFORNIA POSTSECONDARY EDUCATION COMMISSION
Third Floor • 1020 Twelfth Street • Sacramento, California 95814-3985

COMMISSION REPORT 87-16
PUBLISHED MARCH 1987

THIS is the fourth in a series of staff reports on important issues affecting California postsecondary education. These reports are brought to the California Postsecondary Education Commission for discussion rather than for action, and they represent the interpretation of the staff rather than the formal position of the Commission as expressed in its adopted resolutions and reports containing policy recommendations.

Like other publications of the Commission, this report is not copyrighted. It may be reproduced in the public interest, but proper attribution to Report 87-16 of the California Postsecondary Education Commission is requested.

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Changes in California State Oversight of Private Postsecondary Education Institutions

DURING the past few years, the Commission has been actively involved in the effort to strengthen California's licensure process for private postsecondary degree-granting institutions. These activities have included:

1. Developing proposed standards and procedures to be used in the review of out-of-state accredited institutions operating in California;
2. Participating in the on-site review of institutions seeking authorization to award degrees in California; and
3. Reviewing the State's reliance on non-governmental accrediting associations and assessing if such reliance serves the public interest.

Existing statute directs the Commission to review and evaluate the effectiveness of existing law and the implementation of this law by the State Department of Education in "protecting the integrity of degrees and diplomas issued by private postsecondary educational institutions." This next fall, Commission staff will bring to the Commission a prospectus for this review and evaluation, along with an issue paper regarding the State's role in maintaining and promoting quality in private postsecondary educa tion. In this current paper, the staff reviews recent developments in this effort.

Background about California State recognition of private degree-granting institutions

Independent and private institutions are eligible to award academic degrees in California if they meet one of five requirements:

1. Under *Education Code* Section 94310.1(a), *accreditation of in-state institutions* by either the Western Association of Schools and Colleges, the California Committee of Bar Examiners, or a national accrediting association that is recognized by the United States Secretary of Education, such as the National Association of Trade and Technical Schools and the Association of Independent Colleges and Schools;
2. Under Section 94310.1(b), *accreditation of out-of-state institutions* by a regional accrediting association other than WASC that is recognized by the United States Secretary of Education and *licensure* by the State Superintendent of Public Instruction;
3. Under Section 94310.2, *approval* by the State Superintendent of Public Instruction;
4. Under Section 94310.3, *authorization* by the Superintendent; or
5. Under Section 94310.4, *authorization* by the Superintendent for institutions structured by schools of theology and awarding degrees primarily in theology and other areas of religious study.

The accreditation provisions allow institutions to substitute periodic peer review through an accrediting association for review by the State oversight agency -- the Private Postsecondary Education Division in the Department of Education. The approval provision has been considered the highest level of State review, with an assessment made of the overall quality of the institution and its several programs. The authorization provisions have historically existed in California as a means by which both new educational institutions can be started and existing institutions can operate with little or no governmental oversight. Summary information about these five classifications is provided in Display 1 on page 2.

Accredited in-state institutions

Most of the accredited institutions offering degrees in California are accredited by the Western Association of Schools and Colleges (WASC), which consists of three separate accrediting commissions:

- The Accrediting Commission for Senior Colleges and Universities, which currently has accredited

DISPLAY 1 *Provisions for Degree-Granting Authority in California by Private Postsecondary Education Institutions as of January 1986*

Provision	Accreditation (In-State)	Accreditation[1] (Out-of-State)	Approval	Authorization[2]	Authorization for Schools of Theology
Agency Responsible for Oversight	1. A nationally recognized accrediting association; 2. Western Association of Schools and Colleges; or 3. California Committee of Bar Examiners	A regional accrediting association and the California State Department of Education	California State Department of Education, for the Superintendent of Public Instruction	California State Department of Education, for the Superintendent of Public Instruction	California State Department of Education, for the Superintendent of Public Instruction
Type of Review	Institutional	Institutional	Institutional	Institutional	Institutional
Components of the Review Process	Self study; peer evaluation; quality assessment through the use of standards developed by member institutions	Self study; peer evaluation; quality assessment by the State through the use of specific standards and procedures	Self study; peer evaluation; quality assessment through use of specified practices and standards	Compliance with specified standards in 12 areas, including curriculum, instruction and faculty. The review process is conducted by a three-member visiting committee	Verification of the truthfulness and accuracy of the institution's "full disclosure" statement, but no evaluation or quality assessment
Length of Time Recognition Granted by the Agency	Ten years	Five years	Three years	Five years	Three years
Number of Institutions Involved	186 institutions are currently accredited	12 out-of-state institutions are currently licensed	72 institutions are currently approved	94 institutions are currently authorized	Five schools of theology are currently authorized

1. The new licensure process was implemented in January 1, 1986, and prior to December 31, 1987, the State Department of Education is expected to review all institutions under this provision.

2. The new authorization process was implemented in 1984, and prior to July 1, 1987, the Superintendent is expected to review all institutions operating under this provision.

Source: Private Postsecondary Education Division, California State Department of Education.

105 independent four-year and graduate institutions in California;

- The Accrediting Commission for Community and Junior Colleges, which has accredited 13 one- and two-year postsecondary institutions in California; and
- The Accrediting Commission for Schools, which has accredited approximately 1,400 public and private elementary, secondary, and adult schools.

The stated purposes of accreditation by WASC are:

- To assure the educational community, the general public, and other organizations and agencies that an institution has clearly defined educational objectives appropriate to higher education and consistent with Commission standards, has established conditions under which achievement of these objectives can reasonably be expected, appears in fact to be accomplishing them substantially, and is so organized, staffed, and financed that it can be expected to continue to achieve these objectives.

- To foster integrity and excellence in higher education by developing and using standards for assessing educational effectiveness.
- To encourage institutional improvement through self-study and periodic evaluation by qualified professionals.
- Insofar as Commission resources permit, to promote honesty and integrity in institutional relations with students and other consumers, thus both supplementing state agency protection for the educational consumer and providing some protection for sound institutions.
- To promote cooperative efforts of public and independent institutions in opposing encroachments by governmental or other agencies that threaten to jeopardize educational effectiveness or academic freedom (Accrediting Commission for Senior Colleges and Universities, 1982, p. 1).

Both of the WASC accrediting commissions for postsecondary institutions are in the process of reviewing and revising their standards for accreditation, seeking to improve their ability to define minimum standards of quality and promote educational excellence. The product of this important yet extremely difficult task will be available in the Summer of 1987. The Senior Commission met on February 25 to review the third draft of its revised *Handbook on Accreditation*, with several important new provisions being considered:

1. Various definitions of academic freedom are being discussed, particularly as they concern institutions that endorse particular religious or philosophical beliefs. One of the more controversial proposals being considered is the requirement that "political, social, religious, or philosophical beliefs may inform the curriculum but they must not restrict scholarly research, teaching, and discussions."
2. For undergraduate degree programs, the equivalent of two years of study in general education and unrestrictive electives are proposed as a requirement, "even if this extends the basic program." Moreover, undergraduate degrees should be awarded only by those institutions that offer undergraduate programs and not by graduate or professional schools that do not offer complete baccalaureate programs.
3. For doctoral degree programs, institutions should have a core of full-time faculty at the home campus or base facility as well as at each off-campus location.
4. Not more than the equivalent of one year of credit for unsponsored or experimental learning would be allowed toward a student's undergraduate degree, and no such credit would be allowed toward a graduate degree
5. Institutions would be required to maintain a "core of full-time faculty whose primary employment obligation is to teaching and research at the institution."

These five and several other provisions of the Senior Commission's proposed new handbook are controversial among WASC's member institutions. Following publication of the revised handbook in June 1987, it should be anticipated that some currently accredited institutions will receive sanctions and other institutions now seeking accreditation will complain that the process has been made more difficult for them. Perhaps anticipating this situation, the executive director of the Senior Commission of WASC, Kay Andersen, recently issued a statement that "regional accreditation works and makes a huge difference on institutions of all sizes and types, but it can only continue to do so if those who participate in the development of standards will also accept in a cooperative way the imposition of sanctions" (1986, p. 6).

Accredited out-of-state institutions

Passage of Senate Bill 1036 (Montoya, 1985) created a specific category in statute for out-of-state accredited institutions to offer degrees in California and for the Superintendent of Public Instruction to assure compliance with specific standards of quality. It instructed the Director of the California Postsecondary Education Commission to establish "a special committee of persons with demonstrated knowledge of both regional accrediting standards and procedures and the special demands of off-campus programs" in order to draft proposed standards and procedures to be used in the review of out-of-state institutions.

The special committee completed its report, *Oversight of Out-of-State Accredited Institutions Operating in California*, in early 1986, presenting detailed standards and procedures based upon a review of the accrediting practices of the six regional accrediting

associations, including WASC, as well as the approval and authorization standards and procedures used by the State Department of Education. The Commission endorsed that report in April 1986.

Currently, 12 out-of-state regionally accredited institutions operate in California (Display 2). The Private Postsecondary Education Division is now developing an instrument to be used in reviewing and assessing these institutions on the basis of the special committee's recommended standards and procedures, and it hopes to begin the review process in May 1987. By December 31, 1987, it is expected to have reviewed all of these institutions.

DISPLAY 2 Out-of-State Regionally Accredited Institutions Operating in California, 1986

American College for the Applied Arts, Los Angeles

Antioch University, San Francisco

Brigham Young University California Center, Whittier

City University, Bellevue

Columbia College - Missouri, Treasure Island

De Vry Institute of Technology, Los Angeles, Evanston, Illinois

Embry Riddle Aeronautic University, Merced

Norwich University, Montpelier

Nova University, Fort Lauderdale

The Union for Experimenting Colleges and Universities, Cincinnati

University of Bridgeport, Bridgeport

University of Phoenix, Phoenix

Source: Private Postsecondary Education Division, California State Department of Education.

Approved institutions

The 72 institutions currently approved by the Superintendent are listed in Display 3 on page 5. Approximately 80 percent of them offer graduate degrees and approximately 60 percent offer doctoral degrees. About half of them are single-purpose institutions, offering degrees only in one area, such as theater, theology, or transpersonal psychology. An additional quarter offer multiple degree levels in a single general area of study, and the remaining quarter offer several degrees in a variety of subject areas.

The process utilized by the State Department of Education to approve them includes an assessment of the institution's facilities, financial resources, administrative capabilities, faculty and other educational expertise and resources necessary for the degree programs. Senate Bill 1923 (1984, Carpenter) revised the statutory provisions for approval by directing the Superintendent to determine that the curriculum of approved institutions "is consistent in quality with curricula offered by appropriate established accredited institutions," and that "the course for which the degree is granted achieves its professed or claimed academic objective for higher education, with verifiable evidence of academic achievement comparable to that required of graduates of other recognized" accredited institutions

Questions have been raised about whether the State-approval process is sufficiently rigorous to permit the licensure of only quality institutions and whether the approval process identifies institutions with academic curricula comparable to that of accredited institutions. In the Commission's 1984 report, *Public Policy, Accreditation, and State Approval in California*, the Commission concluded that "the State should maintain a sufficiently thorough quality review and approval process for all independent and private institutions so that the public in general as well as other State agencies can rely upon this process in identifying institutions with worthwhile educational programs . . . ." (p. 50).

The Commission therefore recommended efforts to strengthen the approval process, specifically calling for the process to "continue to be programmatic approval, but it should be revised to stipulate that an institution cannot advertise itself as having State approval status until all of its degree programs have been qualitatively reviewed and approved by the State's oversight agency" (Recommendation 3, page 51).

Despite the Commission's recommendation, SB 1923 changed the approval process from programmatic to institutional approval. Since the new process has not yet been either fully implemented or reviewed for its thoroughness, it is premature to judge whether the conclusions and recommendations made by

DISPLAY 3 Approved Institutions, 1986

Academy of Art College, San Francisco

The American Academy of Family Studies, Scotts Valley

American Armenian International College, La Verne

Anaheim Christian College, Anaheim

Bay City College of Dental Medical Assistants, San Francisco

California American University, Escondido

California Christian College, Fresno

California Christian Institute, Orange

California Coast University, Santa Ana

California Graduate Institute, West Los Angeles

The California Graduate School of Marital & Family Therapy, San Rafael

California Graduate School of Theology, Glendale

California Institute for Clinical Social Work, Berkeley

California Missionary Baptist Institute & Seminary, Bellflower

California Pacific University, San Diego

California Theological Seminary, Fresno

The Cambridge Graduate School of Psychology, Los Angeles

Center for Psychological Studies, Albany

Center Graduate College, Saratoga

Charles R. Drew Postgraduate Medical School, Los Angeles

Cleveland Chiropractic College, Los Angeles

Columbia College, Los Angeles

Columbia Pacific University, San Rafael

European University of America, San Francisco

Glendale University College of Law, Glendale

Graduate Center for Child Development & Psychotherapy, Los Angeles

Human Relations Center, Inc., Santa Barbara

Humphrey's College, Stockton

Immaculate Heart College Center, Los Angeles

Institute for Advanced Study of Human Sexuality, San Francisco

Institute for Creation Research, Santee

Institute of Transpersonal Psychology, Menlo Park

International School of Theology, San Bernadino

Koh-E-Nor University, Santa Monica

Laurence University, Santa Barbara

Lincoln University, San Francisco

Lincoln University The Law School, San Jose

Lincoln University - The Law School, San Francisco

Linda Vista Baptist Bible College and Seminary, El Cajon

Magna Carta University School of Law, South San Francisco

Melodyland School of Theology, Anaheim

Music & Arts Institute, San Francisco

The National Hispanic University, Oakland

National University, San Diego

New College for Advanced Christian Studies, Berkeley

The New School of Architecture, Chula Vista

Newport University, Newport Beach

Pacific Coast Baptist Bible College, San Dimas

Pacific Coast University, Long Beach

Pacific States University, Los Angeles

Pasadena College of Chiropractic, Pico Rivera

Peninsula University College of Law, Mountain View

The Professional School of Psychological Studies, San Diego

The Professional School of Psychology, San Francisco

Rosebridge Institute, Walnut Creek

Ryokan College, Los Angeles

Salvation Army School of Officer Training, Rancho Palos Verdes

Sierra University: A University Without Walls, Santa Monica

The Simon Greenleaf School of Law, Anaheim Hills

Southern California Psychoanalytic Institute, Beverly Hills

Sysorex Institute, Cupertino

University Associates Graduate School of Human Resource Development, San Diego

The University for Humanistic Studies, Del Mar

Walden University, Inc., West Covina

Western Graduate School of Psychology, Palo Alto

Western Institute for Social Research, Berkeley

Western Sierra Law School, San Diego

William Carey International University, Pasadena

William Lyon University, San Diego

World University of America (Ojai), Ojai

Wright Institute Los Angeles, Los Angeles

Yeshiva University of Los Angeles, Los Angeles

Source: Private Postsecondary Education Division, California State Department of Education.

the Commission in 1984 should be revised. An opportunity should be provided for the new approval process to be implemented fully and then reviewed for its thoroughness. Existing statute directs the Commission to review the State's procedures for licensing all private postsecondary institutions prior to September 1, 1989, and this issue will be considered as part of that study.

Authorized institutions

Senate Bill 2151, enacted in 1984, changed the process by which the large majority of private, non-accredited institutions are authorized to grant degrees under *Education Code* Section 94310.3. Formerly, an institution could be authorized to grant degrees with only an accurate disclosure of its goals, programs, and resources and the showing of $50,000 in assets devoted to educational use by the institution. The new process requires that an institution's entire program, faculty, academic requirements and physical and fiscal resources meet qualitative standards adopted by the Superintendent of Public Instruction.

Senate Bill 2151 also activated a new category of authorization (*Education Code* Section 94310.4) for religious, degree-granting institutions "structured by schools of theology" which award "degrees primarily in theology and other areas of religious study." This category of authorization continues the less rigorous "disclosure" process for these institutions.

Implementation of Senate Bill 2151

The new authorization process for "Section 94310.3" institutions requires that all currently authorized institutions be examined under the new standards by June 30, 1987, in order to continue operating under this provision of the *Education Code*. The steps the Private Postsecondary Education Division of the Department of Education faced in implementing this new process included:

1. Translating standards developed by the special committee into proposed regulations to be incorporated into the *California Administrative Code* and receiving the approval of the Office of Administrative Law;
2. Preparing application materials based upon the new regulations; and
3. Scheduling the approximately 177 institutions for visits over the period from about June 1, 1985, to June 30, 1987.

Since the first step could have resulted in a prolonged negotiation between the Private Postsecondary Education Division and the Office of Administrative Law over the necessity for the wording of certain of the proposed regulations, the Division's staff decided to proceed to implement the new law on the basis of its *proposed* regulations while continuing to seek clearance from the Office.

Effects of the bill on private institutions

The change in the authorization process from a simple disclosure requirement to a process that requires institutions to comply with standards was a substantial one. The following examples of "Curriculum and Faculty" and "Required Instruction" reflect only three of the thirteen areas in which standards were developed. These three examples, however, illustrate the extent of change some authorized institutions faced in order to continue operating under this section of the *Education Code*.

1. *Curriculum and Faculty:* Under the former process based on disclosure, institutions authorized before the implementation of the 1981 amendments to Section 94310.3 were not routinely visited, and a number of these institutions disclosed only the degree titles they offered. In some cases, requirements for these degrees and the curricula students would follow were individually negotiated with each student, and a single faculty mentor might be retained after the student had enrolled to guide the student through an entire degree program.

New institutions authorized after 1982 were visited upon application, and these institutions were required "to disclose a curriculum and degree requirements." This requirement could be satisfied by a list of courses with course descriptions and any pattern of required courses the institution might select. To the Commission staff, the courses on the lists of some applicant institutions appeared to be randomly selected and the degree requirements quite superficial. Yet in such cases, there existed no basis in law for denying the institutions authorization to operate.

In contrast, under the new process based on standards, all institutions wishing to operate under the authorization standards of Section 94310.3 are visited by a team of examiners (usually three in number) who determine whether the institution complies with these standards. Curricula and graduation requirements are evaluated against "generally accepted postsecondary educational standards." The standard regarding degree programs states:

> Degree programs and designated titles which are not clearly and obviously innovative shall not deviate substantially in required competencies from those commonly required, used, and traditionally accepted as a mark of learning in accredited institutions.

Under the new standards, institutions are required to retain sufficient qualified faculty to offer their degree programs as a prerequisite to authorization. The standards also require that the faculty's assignments be declared and that the institutions provide evidence that all faculty members' education is at or above the level of their assignment.

2. *Required Instruction:* Under the former process based on disclosure, some institutions that wished to circumvent the requirement under Section 94312 that all colleges and universities provide instruction merely offered instruction in a single course (sometimes an orientation course), since no minimum amount of instruction had been indicated in the statute.

In contrast, the new standards specify in detail the limits to the awarding of transfer credit, credit for life experience, and credit by examination. They also require that institutions must ensure that a minimum of 25 percent of each student's degree program is provided through instruction given by the institution's contracted faculty. A continuing problem with this area, which we discuss below under the section on the "Current Status," makes the review and revision of the new standards desirable.

3. *Other Standards:* As mentioned above, the preceding examples were drawn from 13 subdivisions of standards covering such topics as institutional objectives, administrative personnel, procedures for keeping educational records, and financial stability. Numerous standards call for "sufficient" or "appropriate" resources, requirements, and personnel. These two terms are defined in the definition section of the standards as follows:

> "Appropriate" shall mean those characteristics determined by the superintendent to be essential for an institution to achieve its disclosed purposes and proposed ends. The superintendent's determination shall be based upon generally accepted postsecondary educational standards.
>
> "Sufficient" shall mean that quantity determined by the superintendent to be essential for an institution to achieve its disclosed purposes and proposed ends. The superintendent's determination shall be based upon generally accepted postsecondary educational standards.

The move to an authorization process based upon an institution's compliance with minimum standards should enable the Private Postsecondary Education Division of the State's Department of Education to carry out more effectively the legislative intent of the law both to encourage privately supported education and to protect the integrity of degrees conferred by these institutions. The Commission continues to be involved with the Division in an advisory capacity during the implementation of this new law. A representative of the Commission continues to serve on the Council for Private Postsecondary Educational Institutions, which advises the Superintendent of Public Instruction on the administration of this law. Also, the Commission is represented on the visiting teams that visit the applicant institutions.

Current status of the authorization process

Since the new authorization process began in June 1985, 81 institutions of the original 177 institutions, or 46 percent, have been visited and about 20 of them have been denied reauthorization. Another 20 to 25 percent of the original group of 177 has either decided not to submit an application or has withdrawn during the process.

These numbers seem to indicate that the new statute is having the intended effect of weeding out marginal institutions. There are, however, both procedural concerns and concerns that the standards which the law was intended to strengthen still have some significant weaknesses. One procedural concern is the length of the process and the immense amount of time and energy it consumes. As currently framed, the statute provides for an extended procedure of application, review, and appeals that ranges from a minimum of eight months to nearly a year and a

half. Currently, the first institution denied under this process in the Fall of 1985 is presumably still operating while appealing the Superintendent's decision. Another institution that was visited in January 1986 is still awaiting the Superintendent's decision.

Significant weaknesses in the standards exist in the area of "scholastic regulations" which appear to allow graduate programs composed of up to 50 percent credit for life experiences and another 25 percent transfer credit and in "methods of instruction" standards which do not define "instruction." The latter omission has resulted in "instructional procedures" at some institutions that provide for nothing more than mailing a textbook and final exam to a student and grading the final exam. The latter step often entails an objective examination which is graded by an administrative staff member, not the faculty member. While many institutions with this mode of "instruction" have a "faculty mentor" assigned to a student to respond to a student's questions, records at these institutions confirm that most of the interaction between these mentors and students is procedural, having little to do with the content of the course.

Summary

During the past year, several developments have occurred in the effort to maintain and promote quality in the private sector of postsecondary education. Many of these developments will have important implications for the Commission as it begins its mandated review and evaluation of the effectiveness of the existing law. These developments include the following:

1. The new accreditation standards adopted by the senior Commission of WASC in February are controversial among its member institutions, as some of them will have difficulty complying with the new standards. In addition, institutions now seeking WASC accreditation will find their task more difficult.
2. Out-of-state accredited institutions will be reviewed during the coming months through a new licensure process involving formal and cooperative assessment by a regional accrediting association and the State Department of Education. The effectiveness of this new cooperative process has not yet been tested.
3. While existing statute states that the curricula of approved institutions is consistent in quality with the curricula of accredited institutions, questions remain about the rigor and thoroughness of the State approval process and its ability to permit the licensure of only quality institutions.
4. While evidence seems to indicate that the new authorization process is having the desired impact of eliminating some marginal institutions, several obvious weaknesses still exist within the statute which allow other institutions with questionable academic programs to continue to operate in California and throughout the world.

References

Accrediting Commission for Senoior Colleges and Universities, Western Association of Schools and Colleges. *Handbook of Accreditation*, Oakland: The Association, 1982.

Andersen, Kay J. "A Case for Standards." *Annual Report 1985-1986*. Oakland: Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges, September 1986.

California Postsecondary Education Commission. *Public Policy, Accreditation, and State Approval in California: State Reliance on Non-Governmental Accrediting Agencies and on State Recognition of Postsecondary Institutions to Serve the Public Ineterest*. Commission Report 84-28. Sacramento: The Commission, July 1984.

Special Committee for the Review of Out-of-State Accredited Institutions. *Oversight of Out-of-State Accredited Institutions Operating in California: A Report to the California Postsecondary Education Commission Pursuant to Senate Bill 1036*. Commission Report 85-35. Sacramento: The Commission, December 1985.

CALIFORNIA POSTSECONDARY EDUCATION COMMISSION

THE California Postsecondary Education Commission is a citizen board established in 1974 by the Legislature and Governor to coordinate the efforts of California's colleges and universities and to provide independent, non-partisan policy analysis and recommendations to the Governor and Legislature.

Members of the Commission

The Commission consists of 15 members. Nine represent the general public, with three each appointed for six-year terms by the Governor, the Senate Rules Committee, and the Speaker of the Assembly. The other six represent the major segments of postsecondary education in California.

As of March 1987, the Commissioners representing the general public are:

Seth P. Brunner, Sacramento
C. Thomas Dean, Long Beach, *Chairperson*
Seymour M. Farber, M.D., San Francisco
Cruz Reynoso, Los Angeles
Lowell J. Paige, El Macero
Roger C. Pettitt, Los Angeles
Sharon N. Skog, Mountain View, *Vice Chairperson*
Thomas E. Stang, Los Angeles
Stephen P. Teale, M.D., Mokelumne Hill

Representatives of the segments are:

Yori Wada, San Francisco; representing the Regents of the University of California

Claudia H. Hampton, Los Angeles; representing the Trustees of the California State University

Arthur H. Margosian, Fresno; representing the Board of Governors of the California Community Colleges

Donald A. Henricksen, San Marino; representing California's independent colleges and universities

Harry Wugalter, Thousand Oaks; representing the Council for Private Postsecondary Educational Institutions

Angie Papadakis, Palos Verdes; representing the California State Board of Education

Functions of the Commission

The Commission is charged by the Legislature and Governor to "assure the effective utilization of public postsecondary education resources, thereby eliminating waste and unnecessary duplication, and to promote diversity, innovation, and responsiveness to student and societal needs."

To this end, the Commission conducts independent reviews of matters affecting the 2,600 institutions of postsecondary education in California, including Community Colleges, four-year colleges, universities, and professional and occupational schools.

As an advisory planning and coordinating body, the Commission does not administer or govern any institutions, nor does it approve, authorize, or accredit any of them. Instead, it cooperates with other state agencies and non-governmental groups that perform these functions, while operating as an independent board with its own staff and its own specific duties of evaluation, coordination, and planning.

Operation of the Commission

The Commission holds regular meetings throughout the year at which it debates and takes action on staff studies and takes positions on proposed legislation affecting education beyond the high school in California. By law, the Commission's meetings are open to the public. Requests to address the Commission may be made by writing the Commission in advance or by submitting a request prior to the start of a meeting.

The Commission's day-to-day work is carried out by its staff in Sacramento, under the guidance of its executive director, William H. Pickens, who is appointed by the Commission.

The Commission issues some 30 to 40 reports each year on major issues confronting California postsecondary education. Recent reports are listed on the back cover.

Further information about the Commission, its meetings, its staff, and its publications may be obtained from the Commission offices at 1020 Twelfth Street, Third Floor, Sacramento, CA 98514-3985; telephone (916) 445-7933.

CHANGES IN CALIFORNIA STATE OVERSIGHT OF PRIVATE POSTSECONDARY EDUCATION INSTITUTIONS

California Postsecondary Education Commission Report 87-16

ONE of a series of reports published by the Commission as part of its planning and coordinating responsibilities. Additional copies may be obtained without charge from the Publications Office, California Postsecondary Education Commission, Third Floor, 1020 Twelfth Street, Sacramento, California 98514-3985.

Recent reports of the Commission include:

87-2 Women and Minorities in California Public Postsecondary Education: Their Employment, Classification, and Compensation, 1975-1985. The Fourth in the Commission's Series of Biennial Reports on Equal Employment Opportunities in California's Public Colleges and Universities (February 1987)

87-3 Issues Related to Funding of Research at the University of California: A Report to the Legislature in Response to Supplemental Language in the 1985 Budget Act (February 1987)

87-4 The California State University's South Orange County Satellite Center: A Report to the Governor and Legislature in Response to a Request from the California State University for Funds to Operate an Off-Campus Center in Irvine (February 1987)

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